June 4, 2008

VIA ELECTRONIC FILING (ECFS)
Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

RE: **EX PARTE PRESENTATION**
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities
CG Docket No. 03-123

Dear Ms. Dortch:

On June 2, 2008, Julie Miron of Communication Access Center for the Deaf and Hard of Hearing, Inc. (CAC), Bill McClelland of URrelay, Inc., Dixie Ziegler, Vice President of Hamilton Relay, Inc. ("Hamilton"), David O'Connor, counsel for Hamilton, Andy May of CSDVRS, and Karen Peltz Strauss, outside counsel for CSDVRS, held two separate meetings at the Commission regarding the proposed 10-digit numbering plan for IP-based relay services. The first meeting was held with Scott Deutchman, Legal Advisor to Commissioner Copps, and Cristina Hartmann, a legal intern in Commissioner Copps' office. The second meeting was held with the following Commission staff: Cathy Seidel, Chief of the Consumer & Governmental Affairs Bureau ("CGB"), Nicole McGinnis of CGB, Thomas Chandler of CGB, Lisa Boehley of CGB, Brian Millin of CGB, Greg Hlibok of CGB, Richard Hovey of the Public Safety and Homeland Security Bureau, Nicholas Degani of the Wireline Competition Bureau ("WCB") and Heather Henderson of WCB.

At the meetings, Hamilton Relay distributed a leave-behind document which is documented in the attachment to the Ex Parte comments filed by Hamilton Relay on June 3, 2008. That document contains minor clarifications to reflect points made at the meetings. The following points in particular were made by the represented relay providers:

1. **All relay providers must ensure that IP addresses are updated in real time**
This will ensure that any relay user can obtain a number that can be serviced

by any relay provider without consideration of the equipment being used by the relay user. Any numbering solution must also ensure that the number can be ported between relay providers as desired by the relay user, regardless of the equipment used by the relay user. Requiring a numbering solution that mandates real time updates of IP addresses allows all relay providers to be able to service relay numbers, regardless of whether the relay provider distributes end user devices.

2. **Any numbering solution must mandate that relay providers implement hardware/software solutions** or perform upgrades to existing end-user equipment to allow the equipment to update the central database in real time with the end user's current IP address. Otherwise, relay providers that do not distribute end-user equipment may not be able to complete relay calls on behalf of their end users because they do not have access to the end user's current IP address. Any provider that fails to comply with this requirement should not be permitted to distribute numbers.

3. **Number preservation should be a priority with respect to any numbering solution adopted.** One entity securing and distributing numbers for all relay providers is the model that best achieves number preservation. There are two reasons for this. First, if one entity is not responsible for securing and distributing numbers, it would be possible for end users to go to eleven separate providers and obtain eleven 10-digit numbers, one from each provider. The cost of these excess numbers would be borne by the Interstate TRS Fund. Second, numbers are typically sold in large blocks. If eleven or more entities must each secure their own numbering resources, it is more than likely that several of these entities will not need all of the numbers that they are forced to purchase on their own. For example, a provider might have to purchase a block of 1000 numbers in a geographic area where it only needs half that amount. The waste that results will place strains on both the national numbering system and the financial resources of the Interstate TRS Fund. There is no doubt that centralizing the functions of the numbering system to the extent possible is the most cost effective approach.

4. **There needs to be some clarification of the security of a centralized database.** The database would necessarily be accessible to users who wish to place relay or point-to-point calls. This does not mean that the number information being accessed could be changed as a result of this accessibility. The numbering database would function much like the TDI Telephone Book that has existed for many years. However, end user information, including

location information and other confidential information, would exist in a secure centralized database that could only be accessed by relay providers.

5. **URrelay provided clarification of the ONS proposal and other Internet-based relay calling.** Under ONS, the central database needs to be a Uniform Resource Identifier ("URI") structure enabling 10-digit PSTN numbers to be mapped to an Internet addressing URI. In this structure, other types of Internet-based relay such as Instant Messaging, Web- and PC- based applications and other types of third party communication systems can be accommodated. The 10-digit PSTN acts as a pseudo-name when placing an Internet- based call, so the URI that is matched to the 10-digit number will also have to return the type of system that is trying to be reached (i.e., H.323, AIM, MSM, YAHOO, SIP, etc.). Then within those systems a real-time updated IP address is needed to process the connection. For example, if PSTN number "319-555-1212" is mapped to AIM name "CGBDRO," the relay provider would receive a response of AIM "CGBDRO" from the central database upon querying 319-555-1212, and the relay provider would be dependent upon AIM for maintaining the end-user's information. In a second example, "202-555-1212" is an H.323 connection with an IP address. The relay provider would query the database for 202-555-1212 and be returned H.323 as the type and the current IP address of that user end point; however, the user endpoint must keep the IP address in the database updated through a DDNS automatic updater.

CAC and URrelay endorse all principals documented in the Ex Parte comments filed by Hamilton Relay on June 3, 2008.

This filing is made in accordance with Section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2). In the event that there are any questions concerning this matter, please contact the undersigned.

Respectfully submitted,

Communication Access Center for the Deaf and Hard of Hearing, Inc.

Debra L. MacLean

cc: Participants